

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOVAN VAVIC,

Defendant.

CRIMINAL NO.: 19-CR-10081-IT-MPK

JOVAN VAVIC'S MOTION FOR LEAVE TO FILE EXHIBITS
PARTIALLY UNDER SEAL

Coach Jovan Vavic, by and through his counsel of record respectfully moves for leave to file exhibits to a forthcoming Motion to Dismiss, or In the Alternative, for Discovery and an Evidentiary Hearing partially under seal.

In support of this motion, the Coach Vavic states that the exhibits contain references to information that is subject to the protective order in this case. Under the terms of the protective order entered in this case, such materials are to be filed under seal or redacted to remove such references. *See* Dkt. 165.

Accordingly, Coach Vavic respectfully requests leave to file the exhibits under seal, and to file redacted copies on the public docket.

Dated: February 28, 2022

Respectfully submitted,

/s/ Stephen G. Larson

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Stephen G. Larson

Stephen G. Larson

LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), I hereby certify that we have reached out to government counsel to inquire as to their position on the relief requested herein, and as of the time of this filing, have not received a response.

/s/ Stephen G. Larson

Stephen G. Larson